

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff**

VS.

**1.243 ACRES OF LAND, MORE OR LESS
SITUATE IN HIDALGO COUNTY
STATE OF TEXAS, AND HAROLD
M. SUMMERS, et al.
Defendant**

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7:23-cv-00255

ORIGINAL ANSWER OF HIDALGO COUNTY, TEXAS, et al.

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Pablo (Paul) Villarreal, Tax Assessor Collector, Hidalgo County, TX, Hidalgo County Drainage District No. 1, La Joya I. S. D., and South Texas I. S. D. (“Taxing Authorities”), and files its Original Answer to United States of America’s Complaint in Condemnation (“Complaint”) and would respectfully show the Court the following:

1. Taxing Authorities admit the allegations in paragraph 1 of the Complaint.
2. Taxing Authorities admit the allegations in paragraph 2 of the Complaint.
3. Taxing Authorities admit the allegations in paragraph 3 of the Complaint.
4. Taxing Authorities admit the allegations in paragraph 4 of the Complaint.
5. Taxing Authorities admit the allegations in paragraph 5 of the Complaint.
6. Taxing Authorities admit the allegations in paragraph 6 of the Complaint.
7. Taxing Authorities admit the allegations in paragraph 7 of the Complaint.
8. Taxing Authorities admit the allegations in paragraph 8 of the Complaint.

9. Taxing Authorities admit the allegations in paragraph 9 of the Complaint.

WHEREFORE, PREMISES CONSIDERED, Taxing Authorities pray that the Court

- a. recognize the continued existence of and validity of the tax liens securing payment of the taxes, penalties and interest assessed by Taxing Authorities on the subject property;
- b. order that taxes, penalties and interest owing to the Taxing Authorities be paid from the proceeds of the sale after the expenses of preservation of the sale and prior to distribution to any other claimant; and
- c. for all further relief to which Taxing Authorities may be entitled.

Respectfully Submitted,

ATTORNEY FOR TAXING AUTHORITIES

By: /s/ Douglas Steven Bird
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been filed electronically and is to be served by electronic transmission to all parties on the court's electronic mailing matrix on December 27, 2023

/s/ Douglas Steven Bird

DOUGLAS STEVEN BIRD